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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

ALICIA ROHBOCK; RUBY JESSOP; SUSAN BROADBENT; GINA ROHBOCK; NOLAN BARLOW; JASON BLACK; MAY MUSSER; HOLLY BISTLINE; LAWRENCE BARLOW; STEVEN DOCKSTADER; MARVIN COOKE; HELEN BARLOW; VERGEL BARLOW; CAROLE JESSOP; BRIELL LIBERTAE DECKER f/k/a, LYNETTE WARNER; AMY NIELSON; SARAH ALLRED; THOMAS JEFFS; and JANETTA JESSOP,

Plaintiff,

vs.

WARREN STEED JEFFS, et al.,

Defendant.

**DAMAGES DECLARATION
OF VERGEL BARLOW**

Case 2:16-cv-00788-TS

Judge G. Ted Stewart

I, Vergel Barlow, under criminal penalty under the laws of the State of Utah, and pursuant to Utah Code Ann. § 78B-18a-106, declare as follows:

1. I am over twenty-one years of age.
2. I am a Plaintiff in the above-captioned matter.
3. I make these statements based on my own knowledge and belief.
4. As allowed by the Court, I submit this Damages Declaration to summarize and supplement my proffered and trial testimony on September 27, 2022.

5. I grew up in the FLDS Church and watched Warren Jeffs become the Prophet. He started to assume leadership in the church years earlier when his father became sick, so when his father died, it was natural for him to succeed to that position. For years after his father passed, Jeffs represented that he was the Prophet through his words and actions. I, along with the other faithful FLDS people, wholeheartedly accepted him as the Prophet, relied on his representations, and strove to obey his every command.

6. During those years, Jeffs withheld from us the pieces of the puzzle we needed to understand the wrong and illegal things he was doing. Jeffs played on my sincere belief in him and deprived me of the critical information I needed to discover his fraud. It was very difficult to eventually understand and accept what he had admitted without my knowledge: that he was a false prophet that had been destroying the people. I believe that destruction continues among the FLDS people because of the limited information they have.

7. Based on my fraud claim against Jeffs, I estimate that I suffered economic damages as summarized in this Damages Declaration.

8. In reliance on Jeffs' representations, I was required to work with little or no compensation for businesses controlled by Jeffs from at least August 1998. To approximate what

I was not paid, for purposes of this Damages Declaration, I will conservatively use an average hourly rate of \$7.25.

9. My work history and forced donations (withheld wages) from August 1998 through October 31, 2013 are as follows:

- a. In August 1998, when Jeffs took control of the FLDS Church, I was working for Hildale Automotive as a mechanic. Jeffs required that I do free repairs and make donations to the point that I struggled financially to support my family. By early 2007, I was no longer receiving any income from Hildale Automotive and had to find other sources of income.
- b. I also did metal finishing work for Western Precision, a church controlled business from at least 2000 until that business was moved to Nevada in about 2006 after the State of Utah appointed a Special Fiduciary over the United Effort Plan. I was not paid for that work.
- c. In late 2006, I was assigned to work as a member of church security. I was able to keep that job until April 2013 when I lost favor with Jeffs. I worked an average of five hour shifts five days a week and was paid nothing.
- d. In addition to these jobs, I spent nearly all of my other time doing church assignments, including constantly moving people in and out of homes in Short Creek at Jeffs' whim, running a barnyard and milking goats to provide goat milk for the babies born in what I was told were houses of hiding and lands of refuge. I was paid virtually nothing for my time or this milk.

e. Fortunately, I was also assigned to work as a private care giver for two patients and was paid a small monthly amount over several years by the State of Arizona for my services. In October 2013 when I refused to follow an order from Jeffs to break up my family, those patients refused to allow me to care for them. As a result, I lost my last source of income.

10. After leaving Jeffs' program I unsuccessfully tried to find odd jobs in Short Creek so my shunned family could survive. Jobs were very hard to come by between 2014 and the end of 2018, when my income started to stabilize. I continued to suffer economic losses from Jeffs' fraud. At this point, I am fixing cars in my driveway.

11. I conservatively estimate that between August 1998 and the end of 2018, I lost \$306,240 (20 years x 52 weeks + 16 weeks = 1,056 weeks x 40 hours x \$7.25 an hour) because I was defrauded by Jeffs.

12 I was admitted into the United Order in late 2011. While I was in the United Order, I was required to give 100% of any income to Jeffs, including the payments I received from Arizona, in exchange for which I was entitled to food and other necessities from the Bishop's Storehouse. As a member of the United Order, I was allowed housing but was restricted to the storehouse for everything else. What the storehouse could offer was so meager that it was a net loss in terms of the necessities of life that I needed.

13. The housing was provided in a communal setting akin to the standard of living likely experienced by victims of labor trafficking or similar fraud who are required to live with large numbers of people.

14. The value of those survival-level necessities provided by the Bishop's Storehouse should be set off against the hourly rates that I should have been paid from August 1998 and the \$7.25 an hour that I have used in this Damages Declaration to conservatively calculate my forced donations.

15. Nevertheless, I estimate the value of those necessities at \$300 a month over the 182 months from August 1998 through October 2013 when I left to total \$54,600. That total may, at the Court's discretion, be deducted from my economic damages.

16. Therefore, I claim economic damages at least in the total amount of (\$306,240 - \$54,600) \$251,640.

17. Based on the evidence received by the Court in relation to my general or non-economic damages, I ask for an award of general damages in the amount of \$1,000,000.

18. I estimate that my total economic and non-economic damages are at least (\$251,640 + \$1,000,000) \$1,251,640.

19. Finally, I request an award of punitive damages in an amount equal to my total economic and non-economic damages.

I declare under criminal penalty of perjury in the State of Utah that the foregoing is true and correct to the best of my knowledge and belief.



Vergel Barlow